

16-C-5702

16 5704

DEFENDANTS

THOMAS A. REILLY AKA THOMAS REILLY AKA THOMAS REILLY III
90 Upland Terrace
Collingdale, PA 19023

County of Residence of First Listed Defendant Delaware
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

(For Diversity Cases Only)			and One Box for Plaintiff's Demand		
	PTF	DEF		PTF	DEF
Citizen of This State	1	X	Incorporated or Principal Place of Business In This State	4	4
Citizen of Another State	2	2	Incorporated and Principal Place of Business In Another State	5	5
Citizen or Subject of a Foreign Country	3	3	Foreign Nation	6	6

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
110 Insurance	PERSONAL INJURY	625 Drug Related Seizure	422 Appeal 28 USC 158	375 False Claims Act
120 Marine	310 Airplane	of Property 21 USC 881	423 Withdrawal	400 State Reapportionment
130 Miller Act	315 Airplane Product Liability	690 Other	28 USC 157	410 Antitrust
140 Negotiable Instrument				430 Banks and Banking
150 Recovery of Overpayment & Enforcement of Judgment	320 Assault, Libel & Slander		PROPERTY RIGHTS	450 Commerce
151 Medicare Act	330 Federal Employers' Liability		820 Copyrights	460 Deportation
X 152 Recovery of Defaulted Student Loans (Excludes Veterans)	340 Marine		830 Patent	470 Racketeer Influenced and Corrupt Organizations
153 Recovery of Overpayment of Veteran's Benefits	345 Marine Product Liability		840 Trademark	480 Consumer Credit
160 Stockholders' Suits	350 Motor Vehicle	LABOR	SOCIAL SECURITY	490 Cable/Sat TV
190 Other Contract	355 Motor Vehicle Product Liability	710 Fair Labor Standards Act	861 HIA (1395ff)	850 Securities/Commodities/Exchange
195 Contract Product Liability	360 Other Personal Injury	720 Labor/Management Relations	862 Black Lung (923)	890 Other Statutory Actions
196 Franchise	362 Personal Injury - Medical Malpractice	740 Railway Labor Act	863 DIWC/DIWW (405(g))	891 Agricultural Acts
		751 Family and Medical Leave Act	864 SSID Title XVI	893 Environmental Matters
		790 Other Labor Litigation	865 RSI (405(g))	895 Freedom of Information Act
		791 Employee Retirement Income Security Act		896 Arbitration
REAL PROPERTY	CIVIL RIGHTS		FEDERAL TAX SUITS	899 Administrative Procedure Act/Review or Appeal of Agency Decision
210 Land Condemnation	440 Other Civil Rights		870 Taxes (U.S. Plaintiff or Defendant)	950 Constitutionality of State Statutes
220 Foreclosure	441 Voting	PRISONER PETITIONS	871 IRS—Third Party	
230 Rent Lease & Ejectment	442 Employment	Habeas Corpus:	26 USC 7609	
240 Torts to Land	443 Housing/Accommodations	463 Alien Detainee		
245 Tort Product Liability	445 Amer. w/Disabilities Employment	510 Motions to Vacate Sentence		
290 All Other Real Property	446 Amer. w/Disabilities Other	530 General		
	448 Education	535 Death Penalty	IMMIGRATION	
		Other:	462 Naturalization Application	
		540 Mandamus & Other	465 Other Immigration Actions	
		550 Civil Rights		
		555 Prison Condition		
		560 Civil Detainee - Conditions of Confinement		

1 Original Proceeding	2 Removed from State Court	3 Remanded from Appellate Court	4 Reinstated or Reopened	5 Transferred from Another District (specify)	6 Multidistrict Litigation
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Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity)*:

28 U.S.C. 1345

Brief description of cause:

Enforced Collections

CHECK IF THIS IS A CLASS ACTION
UNDER RULE 23, F.R.Cv.P.

DEMAND S

CHECK YES only if demanded in complaint:

JURY DEMAND: Yes ☐ No ☒

(See instructions):

JUDGE

DOCKET NUMBER

NOV - 1 2016

DATE _____

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY



UNITED STATES DISTRICT COURT

16

5704

FOR THE EASTERN DISTRICT OF PENNSYLVANIA – DESIGNATION FORM to be used by counsel to indicate the category of the case of the purpose of assignment to appropriate calendar.

Address of Plaintiff: c/o Suite 5000 – BNY Independence Center, 701 Market Street, Philadelphia, PA 19106-1532

Address of Defendants: 90 Upland Terrace Collingdale, PA 19023

Place of Accident, Incident or Transaction: ACTION OF ENFORCED COLLECTIONS

(Use Reverse Side For Additional Space)

Does this case involve multi-district litigation possibilities?

Yes ☐ No ☒

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action in this court?
Yes ☐ No ☒

CIVIL. (Place ☒ in ONE CATEGORY ONLY)

A. Federal Question Cases

1. ☒ Indemnity Contract, Marine contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☐ All other Federal Question Cases

(Please specify) **Foreclosure of property encumbered by a federal mortgage.**

B. Diversity Jurisdiction Cases:

1. Insurance contract and Other Contracts
2. Airplane Personal Injury
3. Assault, Defamation
4. Marine Personal Injury
5. Motor Vehicle Personal Injury
6. Other Personal Injury (Please specify)
7. Products Liability
8. Products Liability – Asbestos
9. All other diversity Cases

(Please specify)

ARBITRATION CERTIFICATION

(Check appropriate Category)

I, Rebecca A. Solarz, Esq., counsel of record do hereby certify:

- ☐ Pursuant to Local civil Rule 52.2. Section 2©(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs.
- ☐ Relief other than monetary damages is sought.

DATE: 10/17/16

Attorney-at-Law

(sig)

315936
Attorney i.d.#

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 39.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE: 10/17/16

Attorney-at-Law

(sig)

315936
Attorney i.d.#

NOV - 1 2016



**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

Plaintiff

CIVIL ACTION NO.

vs.

THOMAS A. REILLY AKA THOMAS REILLY
AKA THOMAS REILLY III

Defendants

16 5704

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that the defendants do not agree with the plaintiff regarding said designation, that the defendants shall, with their first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which those defendants believe the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus -- Cases brought under 28 U.S.C. §2241 through §2255. ()
- (b) Social Security -- Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration -- Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos -- Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management -- Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ()
- (f) Standard Management -- Cases that do not fall into any one of the other tracks. (X)

10/17/2016

Date

Rebecca A. Solarz, Esq.**Attorney for Plaintiff, United States of America**

Pennsylvania Attorney I.D. No. 315936

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Philadelphia, PA 19106-1532

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RBS

UNITED STATES DISTRICT COURT

FOR THE

EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Plaintiff

vs.

**THOMAS A. REILLY AKA THOMAS
REILLY AKA THOMAS REILLY III**

Defendant

CIVIL NO.

16 5704

COMPLAINT

The United States of America, on behalf of its Agency, U.S. Department of Education, by its specially appointed counsel, Rebecca A. Solarz of KML LAW GROUP, P.C., represents as follows:

1. This Court has jurisdiction pursuant to 28 U.S.C. 1345.
2. The last-known address of the Defendant, THOMAS A. REILLY AKA THOMAS REILLY AKA THOMAS REILLY III ("Defendant") is 90 Upland Terrace, Collingdale, PA 19023.
3. That the defendant is indebted to the plaintiff in principal amount of \$5,092.76, plus interest of \$1,352.25, for a total of \$6,445.01. A true and correct copy of the Certificate of Indebtedness is attached as Exhibit "A" ("Certificate of Indebtedness").
4. Demand has been made upon Defendant by Plaintiff for the sum due but the amount due remains unpaid.

WHEREFORE, the plaintiff demands judgment against Defendant as follows;

- (A) In the amount \$6,445.01.
- (B) Plus filing fee allowed pursuant to 28 U.S.C., Section 1914 in the sum of \$150.00.
- (C) Interest from the date of judgment at the legal rate of interest in effect on the date of judgment until paid in full.
- (D) Costs of suit.

Notice is hereby given to Defendant that Plaintiff intends to seek satisfaction of any judgment rendered in it favor in this action from any debt accruing.

United States of America by and through
its specially appointed counsel
KML Law Group, P.C.

By: 

Rebecca A. Solarz, Esquire
BNY Independence Center
701 Market Street
Suite 5000
Philadelphia, PA 19106-1532
(215)825-6327
rsolarz@kmlawgroup.com

UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

Plaintiff

vs.

**THOMAS A. REILLY AKA THOMAS
REILLY AKA THOMAS REILLY III**

Defendants

CIVIL NO.

EXHIBITS

“A” CERTIFICATE OF INDEBTEDNESS

U. S. DEPARTMENT OF EDUCATION
SAN FRANCISCO, CALIFORNIA

CERTIFICATE OF INDEBTEDNESS #1 OF 1

THOMAS A REILLY
AKA: THOMAS REILLY
AKA: THOMAS REILLY III
90 UPLAND TER
COLLINGDALE, PA 19023-3818
Account No. XXXXX1002

I certify that U.S. Department of Education records show that the BORROWER named above is indebted to the United States in the amount stated below plus additional interest from 09/30/16.

On or about 09/09/99 and 01/15/00, the BORROWER executed promissory note(s) to secure loan(s) of \$2,578.00 and \$2,907.00 from the U.S. Department of Education. This loan was disbursed for \$2,578.00 on 09/28/99 through 10/22/99 and \$2,907.00 on 02/01/00 at a variable rate of interest to be established annually. The loan was made by the Department under the William D. Ford Federal Direct Loan Program under Title IV, Part D of the Higher Education Act of 1965, as amended, 20 U.S.C. 1087a et seq. (34 C.F.R. Part 685). The Department demanded payment according to the terms of the note, and the BORROWER defaulted on the obligation on 08/18/09. Pursuant to 34 C.F.R. § 685.202(b), a total of \$978.60 in unpaid interest was capitalized and added to the principal balance.

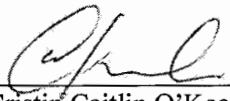
The Department has credited a total of \$3,150.02 in payments from all sources, including Treasury Department offsets, if any, to the balance. After application of these payments, the BORROWER now owes the United States the following:

Principal:	\$5,092.76
Interest:	\$1,352.25
Total debt as of 09/30/16:	\$6,445.01

Interest accrues on the principal shown here at the current rate of 3.45% and a daily rate of \$0.48 through June 30, 2017, and thereafter at such rate as the Department establishes pursuant to Section 455(b) of the Higher Education Act of 1965, as amended, 20 U.S.C. 1087e.

Pursuant to 28 U.S.C. § 1746(2), I certify under penalty of perjury that the foregoing is true and correct.

Executed on: September 30, 2016


Cristin Caitlin O'Keefe
Loan Analyst
Litigation Support Unit